SPCC/FRP INSPECTION REPORT

SPCC CASE NUMBER:	PA-96-038	FACILITY NAME:	Carlos R. Leffler-Tuckerton Terminal		
FRP NUMBER:	NA PA 623-619	FAC STREET NO. & NAME:	4030 Pottsville Pike		
TGT DATE:	July 16, 1996	FAC CITY:	Reading	FAC CNTY:	Berks
TARGET BY:	Michael Welsh	FAC STATE:	PA	FAC ZIP:	19605
INSPECTION DATE:	July 16, 1996	FAC MLG ADDRESS:	P.O. Box 278 Richland, PA 17087-0278		
LEAD INSPECTOR:	Michael Welsh	FACILITY REP NAME:	Mr.	Dennis J.	Olson
LEAD INSP. PHONE NO.:	3285	FACILITY REP TITLE:	Safety Director		
FOLLOW INSPECTOR:	Glenn Lapsley	FACILITY REP PHONE:	(800)-222-2531		
INIT PLAN RVW DATE:	July 29, 1996	OWNER/OPER NAME:	Carlos R. Leffler		
CURRENT PLAN DATE:	July 8, 1994	OWNER/OPER ADDRESS:	225 E. Main Street Richland, PA 17087		
DATE NON SENT:	July 11, 1996	START OPS DATE:	1994	DATE PLAN REQUIRED:	1994
CLOSURE PLN RVW DATE:	October 28, 1996	OIL STORED ABOVEGRD:	7,400,000	OIL STORED UNDERGRD:	5,000
CLOSURE PLAN DATE:	September 1996	SPCC PLAN PREPARED:	Yes	AVAIL. FOR REVIEW:	Yes
CLOSURE DATE:	October 28, 1996	DATE PLAN CERTIFIED:	7/8/94	SEAL AFFIXED:	Yes
NAT'L FRP NUMBER:	NA	ENGINEER NAME:	J. Glenn Ebersole	LIC. STATE & NUMBER:	PA 19602-E
COAST GUARD JURISDICTN:		PLAN RVWD @ 3YR INTVLS:	NA	DATES OF REVIEW:	NA
DATE FRP NON SENT:		1K SPILLS IN LAST YR?	No	(2) SPILLS IN LST YR?	No
DATE FRP APVL SENT:		REFERRED TO ORC:		ASSIGNED TO:	
NOV CASE NUMBER:		ORC PENALTY:		HEARING DATE:	
NOV SENT:		AMOUNT SETTLED:		AMOUNT COLLECTED:	

UNITED STA'. ENVIRONMENTAL PROTECTION AGEN . . - REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

ACKNOWLEDGEMENT AND RECORD OF SPCC/FRP INSPECTION/PLAN REVIEW

SPCC CASE NUMBER: PA-96-038 FRP REGIONAL ID#: N/A DATE: 7/16/96

TO: Regina A. Starkey, SPCC Coordinator (3HW32)
CC: Linda J. Ziegler, FRP Coordinator (3HW32) (only if FRP applicable)

Inspector's Printed Name/Signature: M. WELSH / M. Welsh

Inspection Team Members: WELSH/LAPSLEY

Name/Location of Facility: CARLOS R. LEHLER

Address: 4030 POTTSVILLE PIKE

City: READING County: BERKS State: PA Zip: 19605

Facility Contact/Title: STEPHEN LONG

Telephone Number: (610) 921-2016

Name of Owner/operator: CARLOS R. LEHLER

Address: P.O. Box 278 225 E. MAIN ST

City: RICHMOND State: PA Zip: 17087

Telephone Number:

** See pages 11 to 12 for FRP only information

Synopsis of business operations: PETROLEUM DISTRIBUTION

Route of entry and estimated distance to waterway: 2 MILES TO LAUREL CREEK TRIBUTARY TO SCHUYLKILL (STORM SWR)

Acknowledgement:

I acknowledge that an SPCC/FRP inspection of this facility was conducted on the 16TH day of JULY, 19 96.

Facility Representative Printed Name/Signature:

NOTE: During this inspection the owner/operator of the facility was asked to provide an extra copy of the SPCC Plan, which will be submitted with this report to the SPCC Coordinator. An extra copy of the SPCC Plan was provided to the inspector (Y/N). If no, the owner/operator of the facility has been asked to send a copy of the SPCC Plan, if available, via certified mail, return receipt requested, within 14 days of the date of this inspection to the SPCC Coordinator (mail code 3HW32) at the address on this letterhead (Y/N).

[Original of this page to SPCC coordinator, copy to facility representative]

(4/96)

Type of Facility (check all applicable descriptions):

[X]	onshore	[X]	commercial
[ ]	offshore	[ ]	agricultural
[ ]	oil well drilling	[ ]	public
[ ]	oil production	[ ]	waste treatment
[ ]	oil refining	[X]	loading racks
[X]	oil storage	[ ]	vehicles/rail cars (in-facility)
[ ]	industrial	[ ]	pipelines (in-facility)
[ ]	transformers/oil-filled equipt	[ ]	oil drum storage areas

Date of facility start operations: MAY 1994

Date facility first required plan: 1994

Oil storage capacity aboveground: 7.4 M gallons

Oil storage capacity underground: 5,000 gallons

SPCC Plan prepared: MAY 1994 ** FRP Plan Prepared: NO

SPCC Plan available for review: YES ** FRP Plan Available: NO

Facility normally attended at least 8 hours: YES (WEEK)

SPCC Plan Certified (seal affixed): YES

Date Certified: 7/8/94

Name of Engineer: J. GLENN EBERSOLE, JR

License Number: 19602-E State: PA

SPCC Plan reviewed every three years: N/A

Record of SPCC Plan review available: N/A

Date(s) of Review(s): N/A

Spill of more than 1000 gallons in past 12 months: NO

If yes, date of spill: _____ Was Plan submitted per 40 CFR 112.4: _____

Two spills of harmful quantity in past 12 months: NO

If yes, dates of spills: _____ Was Plan submitted per 40 CFR 112.4: _____

Has there been a change in facility design, construction, operation, maintenance which could affect the facility's potential for discharge? If so, describe: 2 TANK O.O.S. 26 & 27

Date of Latest Change: Date Plan Amended:

Plan includes a prediction of equipment failure(s) which could result in a discharge from the facility per 40 CFR 112.7(b): .....

Plan discusses appropriate containment and/or diversionary structures or equipment [see page 10 for examples] per 40 CFR 112.7(c): .....

Installation of structures or equipment listed in 112.7(c) was determined to be impracticable: .....

- If yes, impracticability clearly demonstrated: .....
- If yes, contingency plan per 40 CFR 109 provided: .....
- If yes, written commitment provided: .....

General notes/comments:

The following information directly reflects the requirements of 40 CFR 112 as applicable to the facility inspected.

The SPCC Plan must include complete discussion of the following [applicable] guidelines, spill prevention, containment procedures, or State rules, regulations or guidelines (if more stringent):

Facility Drainage, Onshore (excluding production facilities):

a.	from diked storage areas via valves:	~~NA~~ OK IVALV
	valves manually operated:	~~NA~~ OK
b.	from diked storage areas via pumps or ejectors:	OK
	pumps or ejectors manually operated:	OK
c.	storm water inspected prior to discharge:	OK
d.	from undiked areas into catchment basins:	NA
e.	if dikes or catchment basins are not utilized, is there a diversion system to return spills to the facility:	NA
f.	is drainage water treated at the facility: ..... PREDOMINATELY 3K COMA TRUCKS - SOME 7K TRUCKS	YES

Inspector's comments on Facility Drainage, Onshore (excluding production facilities), based upon inspection:

Bulk Storage Tanks, Onshore (excluding production facilities):

a.	Material and construction of tanks compatible to the oil stored and the conditions of storage:	OK
b.	All Tank installations have secondary containment:	OK
c.	Secondary containment appears to be adequate: QUESTIONABLE	?
d.	Diked areas are sufficiently impervious:	OK
e.	Drainage from diked areas to on-site treatment:	NA
	If no, is the bypass valve normally sealed closed:	NA
	Drainage from diked area is inspected:	OK
	Bypass valve is opened and resealed properly:	OK
	Adequate records of dike drainage are maintained:	NO
f.	Underground tanks at this facility:	YES
	Protected from corrosion: TK WITHIN TK	OK
	Pressure tested periodically:	OK
g.	Partially buried tanks at this facility:	NO
	Buried sections protected from corrosion:	NO
h.	Aboveground tanks at this facility:	YES
	Subject to periodic integrity testing:	NO
	Records of inspections maintained:	NO
	Internal heating coils utilized:	NO
	If yes, steam return/exhaust monitored:	NA
	External heating system utilized:	NA
	Tanks are "fail-safe" engineered:	OK
	Audible high liquid level alarm: BUCKEYE PIPELINE	OK
	Visual high liquid level alarm:	NA
	Automatic high liquid level pump cutoff:	NA
	Communications between gauger and pumping station:	NA
	System of determining liquid level in tanks such as	
	sensing devises:	NA
	Direct vision gauges:	OK
	Sensing devises and/or gauges regularly tested: STICKED	OK
i.	Effluents discharges directly to navigable waters observed frequently to detect oil spills: NPDES	OK
j.	Causes of oil leaks resulting in accumulations of oil in diked areas are promptly corrected:	OK
k.	Mobile or portable tanks at this facility: (1) TANKER (EMPTY)	NA
	If yes, are positioned properly:	NA
	A secondary means of containment is utilized:	NA

Inspector's comments on Bulk Storage Tanks, Onshore (excluding production facilities), based upon inspection:

Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities):

a. Buried pipelines are corrosion protected: ABOUT 1/2 PIPING WRAPPED THRU DIKE WALL — OK

b. Not-in-service pipelines are capped or blank-flanged, and marked as their origin: 2 TANKS C.O.S. — OK

c. Pipe supports are designed to minimize abrasion and corrosion, and allow for expansion and contraction: — OK

d. Aboveground pipelines are inspected regularly: — OK

e. Periodic pressure testing is conducted: — NO

f. Vehicle traffic warned of aboveground pipelines: — NA

Inspector's comments on Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities), base upon inspection:

Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore:

a. Rack drainage flows to catchment basin: — NA

b. Rack drainage flows to treatment system: 3K GAL COMPT OWS (IS THIS ADEQUATE) — OK

If no (a or b), is secondary containment used: — NA

c. Is a system used to prevent vehicular departure before complete disconnect from transfer lines: — OK

interlock warning lights: — NA

physical barrier system: AIR BRAKE SYS (SCHUCH) — OK

warning signs: — NA

d. Vehicle inspection before departing facility: — OK

Inspector's comments on Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore, based upon inspection

Oil production Facilities, Onshore:

a. Drainage from secondary containment systems at tank batteries and central treatment stations are closed and sealed at all times except when rainwater is being drained: .....

b. Prior to drainage, accumulated oil on the rainwater is picked up and returned to storage or disposed of: .....

c. Field drainage ditches, road ditches, and oil traps, sumps or skimmers are regularly inspected for oil: .....

Accumulated oil is removed: .....

d. Aboveground tanks at this facility: .....

Material and construction are compatible with the oil stored and the conditions of storage: .....

Secondary means of containment appears adequate: .....

Tank inspections are conducted periodically: .....

By a competent person: .....

Includes tank foundation and supports: .....

Tank battery installations fail-safe engineered: .....

Adequate tank capacity to prevent tank overfill: .....

Overflow equalizing lines between tanks: .....

Vacuum protection to prevent tank collapse: .....

High level alarms: .....

e. Facility transfer operations at this facility: .....

Aboveground valves/pipelines examined periodically: .....

Brine disposal facilities examined often: .....

Flowline maintenance program established: .....

Records of inspection maintained: .....

Inspector's comments on Oil Production Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Onshore:

a. Mobile drilling/workover equipment positioned to prevent spilled oil from entering waters: .....

b. Secondary containment utilized: .....

c. Blowout prevention (BOP) assembly utilized: ..... *

d. Well control system utilized: ..... *

***NOTE: casing and BOP installations should be in accordance with State regulatory agency requirements**

Inspector's comments on Oil Drilling and Workover Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Offshore:

a. Oil drainage collection equipment utilized: .....
Drains controlled/directed to central collection: .....

b. Sump system, if used, adequate sized: .....
Spare pump/equivalent method available: .....

c. Separators/treaters equipped with dump valves: .....
Measures in place should dump valve fail: .....

d. Atmospheric storage/surge tanks equipped with high level sensing devices: .....

e. Pressure tanks equipped with high and low pressure sensing devices: .....

f. Tanks are corrosion protected: .....

g. Written procedure for inspecting and testing pollution prevention equipment and systems prepared: .....
Written procedure maintained at the facility: .....
Written procedure included in SPCC Plan: .....
Inspections and tests conducted periodically: .....

h. Surface and subsurface well shut-in valves and devices are sufficiently described: .....
Detailed records for each well maintained: .....

i. Blowout prevention (BOP) assembly utilized in accordance with State regulatory agency requirements: .....

j. Well control measures provided in the event of emergency conditions: .....

k. Written instructions are prepared for contractors and subcontractors by the owner or operator: .....
Such instructions are maintained at the facility: .....

l. Manifolds are equipped with check valves: .....

m. Flowlines are equipped with high pressure sensing device and shutin valve at the wellhead: .....
If no, a pressure relief system is provided: .....

n. Pipelines are corrosion protected: .....

o. Sub-marine pipelines are stress protected: .....
Sub-marine pipelines are inspected periodically: .....
Inspections are documented and maintained: .....

Inspector's comments on Oil Drilling and Workover Facilities, Offshore, based upon inspection:

Inspection and Records

a. Inspections required by 40 CFR 112 are in accordance with written procedures developed for the facility: ..... NO

b. Written procedures and a record of inspections are signed by the appropriate supervisor or inspector: .....

c. Written procedures and a record of inspections are made part of the SPCC Plan: .....

d. Written procedures and a record of inspections are maintained for a period of three years: 4

Inspector's comments on Inspections and Records, based upon inspection:

Security (excluding oil production facilities):

a. Facility is fully fenced: ..... OK

b. Entrance gates locked and/or guarded: ..... OK

c. Master flow and drain valves secured in closed position when in a non-operating or non-standby status: ..... OK

d. Starter control on pumps locked in the "off" position or located at a site accessible only to authorized personnel when in a non-operating or non-standby status: ..... OK

e. Loading/unloading connection of pipelines are capped or blank-flanged when not in service: ..... NA

f. Facility lighting appears to be adequate to facilitate the discovery of spills during hours of darkness and to deter vandalism: ..... OK

Inspector's comments on Security (excluding oil production facilities), based upon inspection

Personnel Training and Spill Prevention Procedures:

a. Designated person accountable for spill prevention: ..... STEPHEN LONG ..... OK

b. Spill prevention briefings scheduled periodically: ..... NO

** c. Personnel response training records (According to USCG Training Elements for Oil Spill Response) .....

** d. Drill records (according to PREP Guidelines - 5 Year retention).....

QI Notification @ 3 mos., Tabletop (Annual), Unnannounced (Annual).....
Deployment: Own Eqpt (Semi-annual), OSRO (Annual).....

Inspector's comments on Personnel Training and Spill Prevention Procedures, based upon inspection:

Aboveground Storage Tank and Appurtenances Inspection Checklist:

1.	Check Tanks for leaks, specifically looking for	
	a. Drip marks and stains	OK
	b. Discolorations of tanks — SOME PAINTING REQ'D	
	c. Puddles of stored material	OK
	d. Corrosion — " " "	
	e. Cracks	OK
	f. Localized dead vegetation	OK
2.	Check Foundations for	
	a. Cracks	OK
	b. Settling	OK
	c. Gaps between tank and foundation	YES
	d. Puddles of stored material	OK
	e. Discoloration	OK
3.	Check pipes and valves for	
	a. Droplets of stored material	OK
	b. Discoloration	OK
	c. Corrosion	OK
	d. Bowing of pipes between supports	OK
	e. Presence of stored material on valves	OK
	f. Evidence of leakage at joints and seams	OK
	g. Localized dead vegetation	OK

Inspector's comments on Aboveground Storage Tank and Appurtenances, based upon inspection

Inspector's comments on Underground Storage Tank and Appurtenances, based upon inspection:

Secondary Containment Checklist:

1. Secondary Containment (dike or berm system)
   - a. Capacity appears adequate ..... QUESTIONABLE
   - b. Drainage mechanism manually operated ..... VALVES
   - c. Sufficiently impervious to stored materials .....
   - d. Presence of stored material within dike or berm .....
   - e. Standing water within dike or berm ..... SOME
   - f. Debris within the dike or berm area .....
   - g. Erosion or corrosion of dike or berm ..... SOME

   [ ] [OK] [OK] [OK] [OK] [OK] [OK]

2. Secondary Containment (other systems such as moat, catch-basin, pond, etc)
   - a. Capacity appears adequate .....
   - b. Drainage mechanism manually operated .....
   - c. Presence of stored material within secondary containment .....
   - d. Standing water within the secondary containment system .....
   - e. Debris within the secondary containment system .....
   - f. Erosion or corrosion of the secondary containment system .....

   [NA] [ ] [ ] [ ] [ ] [ ]

3. Secondary Containment (drainage systems)
   - a. Drainage adequate to return spilled material to facility .....

   [NA]

4. Secondary Containment (none or inadequate)
   - a. Demonstration of impracticability .....
   - b. Contingency Plan developed per 40 CFR 109 .....
   - c. Written commitment .....

   [NA] [ ] [ ]

Inspector's comments on Secondary Containment, based upon inspection:

Check the appropriate box:

☐ THIS FACILITY IS NOT SUBJECT TO FRP REGULATIONS

☐ IS A COPY OF ATTACHMENT C-II FILLED OUT AND MAINTAINED WITH THE SPCC PLAN? IF NO PROVIDE A COPY AND REQUEST FILLED OUT FORM BE PROVIDED ALONG WITH THE SPCC PLAN.

☐ THIS FACILITY IS SUBJECT TO FRP REGULATIONS BUT HAS NOT PROVIDED A COPY TO EPA REGION III

**** (THIS SECTION APPLIES TO FRPS ONLY)**

The following 3 lines to be filled out before on-site inspection:

FRP Regional ID # _____ Reviewer Name _____ Date of FRP Plan Review Checklist _____

Please note any discrepancies between the list and the actual equipment available.

RESPONSE EQUIPMENT INSPECTION LOG

Equipment	Comments